

EXHIBIT NO. 12

D.S. A MINOR, ET AL vs CITY OF HUNTINGTON PARK, ET AL
Lt. Saul Rodriguez on 12/10/2024

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

D.S. a minor by and through his)	Case No. 2:23-ev-09412-
his guardian ad litem Elsa)	CBM-AGR
Acosta, individually and as)	
successor-in-interest to William)	
Salgado; C.S., a minor by and)	
through his guardian ad litem)	
Elsa Acosta, individually and)	
as successor-in-interst to)	
William Salgado, J.S., a minor)	
by and through her guardian ad)	
litem Elsa Acosta, individually)	
and as successor-in-interest to)	
William Salgado; M.S., a minor)	
by and through her guardian ad)	
litem Elsa Acosta, individually)	
and as successor-in-interest to)	
to William Salgado.)	
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF HUNTINGTON PARK; NICK)	
NICHOLS; RENE REZA; MATTHEW)	
RINCON; APRIL WHEELER; and DOES)	
5 through 10, inclusive,)	
)	
Defendants.)	

REMOTE DEPOSITION OF

LT. SAUL RODRIGUEZ

Tuesday, December 10, 2024

Reported by:
Janet Marsden
C.S.R. 9940
Job No. 122620

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1 UNITED STATES DISTRICT COURT

2 CENTRAL DISTRICT OF CALIFORNIA

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his guardian ad litem Elsa) CBM-AGR
5 Acosta, individually and as)
successor-in-interest to William)
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and as successor-in-interest to)
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by and through her guardian ad)
11 litem Elsa Acosta, individually)
and as successor-in-interest to)
12 to William Salgado.)

13 Plaintiffs,)

14 v.)

15 CITY OF HUNTINGTON PARK; NICK)
NICHOLS; RENE REZA; MATTHEW)
16 RINCON; APRIL WHEELER; and DOES)
5 through 10, inclusive,)

17 Defendants.)
18

19

20 Remote deposition of

21 LT. SAUL RODRIGUEZ, taken on behalf of the
22 Defendants, on Tuesday, December 10, 2024,
23 at 1:37 p.m., via Zoom videoconferencing,
24 before Janet Marsden, C.S.R. No. 9940.

25

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12 -AND-

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EXHIBITS

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4 Photograph of officer coming up stairway (1 page)	119

INFORMATION REQUESTED

(None)

MARKED QUESTIONS OR COLLOQUY

(None)

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1 TUESDAY, DECEMBER 10, 2024; 1:37 P.M.

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3

4 LT. SAUL RODRIGUEZ,

5 having been first duly sworn or affirmed,

6 was examined and testified as follows:

7

8 EXAMINATION

9 BY MR. LEVINE:

10 Q All right. Good afternoon.

11 A Good afternoon.

12 Q Could you start by please stating and spelling

13 your name for the record.

14 A It's Saul Rodriguez, S-A-U-L, R-O-D-R-I-G-U-E-Z.

15 Q Have you had your deposition taken before?

16 A Yes.

17 Q How many times approximately?

18 A Once.

19 Q Do you recall approximately how long ago that

20 would have been?

21 A I don't remember how long.

22 Q Do you recall if that was a case in which you

23 were named as a defendant?

24 A I don't remember the -- the circumstances.

25 Q Have you testified in court before?

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1 A Yes.

2 Q How many times approximately?

3 A More than 50 times.

4 Q Were those in criminal court, if you know?

5 A Yes.

6 Q Have you ever testified in court in a civil case
7 before, if you recall?

8 A No.

9 Q So I ask just to get your familiarity.

10 We have a court reporter here today who will be
11 taking down all of my questions, your answers, any
12 objections your attorney might make on the record, and so I
13 just wanted to say it's important that we both speak slowly
14 so we can get everything down and also just not to talk
15 over each other, although that may be natural in normal
16 conversations. Does that make sense?

17 A Yes.

18 Q I'll plan to go for about an hour and then take a
19 break, but if you need a break at any time sooner than
20 that, please just let me know and we can take one so long
21 as we've gotten an answer to whatever the last question
22 was. Does that work for you?

23 A Yes.

24 Q Thank you. Is there any reason why you cannot
25 give your best testimony today?

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1 A No.

2 Q Do you understand we're here to discuss an
3 incident involving somebody named William Salgado?

4 A Yes.

5 Q Have you reviewed any documents in preparation
6 for this deposition today?

7 A Yes.

8 Q What documents?

9 A With my -- with my attorneys, with the lawyers.

10 Q Yeah. Any documents that you've reviewed for
11 this deposition?

12 A I'm sorry?

13 Q I'm asking what the documents are that you've
14 reviewed in preparation for this deposition.

15 A Just the documents that my attorneys would
16 discuss with me.

17 Q Do you recall what documents those are?

18 A Just documents for the case, regarding the case.

19 Q Are you able to be any more specific?

20 And just to clarify, I don't want you to share
21 any discussions you had with your attorney. I'm just
22 interested in knowing what are the actual documents that
23 you reviewed in preparation for this deposition.

24 For example, did you review any police reports?

25 A No, I didn't. No reports.

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1 mind for the next few questions that I'm going to ask.

2 A Okay.

3 Q During that time period, did you see William have
4 a gun at any point?

5 A No.

6 Q Could you tell if William had a gun anywhere on
7 his person during that period of time?

8 A I could not tell.

9 Q Did you observe William harm himself physically
10 at all during that period of time?

11 A No.

12 Q Did you see William -- was William attacking
13 anybody at any point during that period of time?

14 A No.

15 Q Could you tell if William was armed with any
16 weapon at any point during that period of time?

17 A No.

18 Q During that period of time, did he continue to
19 have his right hand out of his pocket?

20 A The right hand, yes. That was visible.

21 Q Okay. And could you tell during that period of
22 time if anything was in his right hand?

23 A No.

24 Q But you didn't notice anything that stood out to
25 you in his right hand during that period of time, correct?

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1 Q Because he was armed with a gun?

2 A No. Because he was not inside hiding or
3 barricaded somewhere, so we didn't need the dog at that
4 point either.

5 Q To your knowledge, is the training that your
6 department provides, that police are only to be used when
7 someone is hiding or barricaded?

8 A Yes.

9 Q There is no other use cases or utility for a
10 police dog that you are trained on in your department, as
11 far as you know?

12 A Unless they are also trained for narcotics.

13 Q Okay. I was asking you earlier about some of the
14 training that you've received as a police officer,
15 including at your department, before Mr. Henderson was
16 asking you his questions. Do you remember when I was
17 asking you those general training questions towards the
18 end?

19 A Yes.

20 Q Were you also trained that officers should give
21 clear commands to a subject when trying to gain compliance
22 from him?

23 A Yes.

24 Q Is part of the reason for that so that the
25 subject can understand what the commands are?

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1 A Yes.

2 Q Were you also trained that one officer should be
3 giving commands at a time to avoid confusion?

4 A Yes.

5 MR. LEVINE: I don't have any further questions.

6 MR. HENDERSON: Sorry. But I have one follow-up
7 that I forgot to ask.

8

9 FURTHER EXAMINATION

10 BY MR. HENDERSON:

11 Q And that's this -- I think it's just one or two
12 questions.

13 Officer, I think you said there was about a
14 hundred previous different ones that you had responded to,
15 calls with mental health, you know, where there was an
16 emotionally disturbed or suicidal person. What's your best
17 estimate in those of about how many of those you were
18 actually able to get the mental health professional to come
19 out?

20 A My guess would be about in -- approximately 15.

21 MR. HENDERSON: Okay. All right. I don't have
22 anything else.

23 Thank you.

24 MS. GARCIA: Okay.

25 MR. LEVINE: Thank you, everybody. Thank you,

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1 Lieutenant.

2 THE REPORTER: Does anyone need a copy of the
3 deposition besides Mr. Levine?

4 THE WITNESS: You're welcome.

5 MS. GARCIA: I do.

6 MR. HENDERSON: I'm going to take a copy.

7 THE REPORTER: Is electronic okay for the copies?

8 MR. HENDERSON: Yes.

9 MS. GARCIA: Yes.

10 (The deposition concluded at 4:46 p.m.)

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1 SIGNATURE UNDER PENALTY OF PERJURY

2

3

4 I hereby declare I am the deponent in the within
5 matter; that I have read the foregoing deposition and know
6 the contents thereof and I declare that the same is true of
7 my knowledge except as to the matters which are therein
8 stated upon my information or belief, and as to those
9 matters I believe it to be true.

10 I declare under penalty of perjury that the
11 foregoing is true and correct.

12

13

14 Executed on the _____ day of _____,
15 (date) (month)

16

20 _____, at _____,
16 (year) (city)

17

(state)

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LT. SAUL RODRIGUEZ

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1 I, Janet Marsden, C.S.R. 9940, do hereby declare:

2 That, prior to being examined, the witness named
3 in the forgoing deposition was by me duly sworn pursuant to
4 Section 30 (f)(1) of the Federal Rules of Civil Procedure
and the deposition is a true record of the testimony given
by the witness;

5 That said deposition was taken down by me in
6 shorthand at the time and in the manner herein named and
thereafter reduced to text under my direction.

7 That the witness was requested to review
8 the transcript and make any changes to the transcript as a
9 result of that review pursuant to Section 30(e) of the
Federal rules of Civil Procedure.

10 No changes have been provided by the
witness during the period allowed.

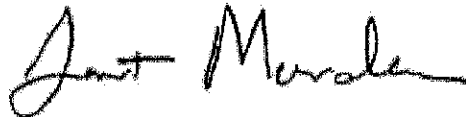
11 The changes made by the witness are
12 appended to the transcript.

13 x No request was made that the transcript be
14 reviewed pursuant to Section 30 (e) of the Federal Rules of
Civil Procedure.

15 I further declare that I have no interest in the
event of the action.

16 I declare under penalty of perjury under the laws
17 of the United States of America that the foregoing is true
and correct.

18 WITNESS my hand this 29th of December, 2024

19
20 

21
22 Janet Marsden, C.S.R. 9940